

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNITED SERVICES AUTOMOBILE)
ASSOCIATION)
a Texas reciprocal inter-insurance exchange,)
)
Plaintiff,)
)
v.) Civil Action No. 2:18-CV-245 (JRG)
)
WELLS FARGO BANK, N.A.,) JURY TRIAL DEMANDED
a national banking association,)
)
Defendant.)

**PLAINTIFF'S SECOND AMENDED DISCLOSURE NARROWING CLAIMS
FOR PURPOSES OF TRIAL**

Plaintiff United Services Automobile Association (“USAA”) hereby provides this second amended disclosure narrowing the number of claims to be presented at trial. The claims that have been asserted in this case but are not within the narrowed list below remain asserted against Defendant because they represent distinct inventions for purposes of infringement, damages and trial. As a result, USAA reserves its due process right to present the asserted claims that are not within the list below in a separate trial.

Moreover, USAA is narrowing claims based on an analysis of documents and information produced to date that describe or discuss aspects of the accused infringing products designed, manufactured, imported, and offered for sale by Defendant. As a result, USAA reserves the right to amend its identification of claims based on additional information obtained through discovery or otherwise.

This disclosure is made solely for the purpose of this action. This disclosure is subject to all objections as to competence, relevance, materiality, propriety, and admissibility and to any and all other objections on any grounds that would require the exclusion of statements contained herein if such disclosure were asked of, or statements contained herein were made by, a witness present and testifying in court, all of which objections and grounds are expressly reserved and may be interposed at the time of trial.

The selected claims for trial are as follows:

patent	Claim	# of claims
'571	1-6, 9, 12-13	9
'090	1-7, 10	8
Total		17

Respectfully submitted,

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**Attorneys for Plaintiff United Services
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CERTIFICATE OF SERVICE

I hereby certify that, on October 27, 2019, a true and correct copy of the foregoing was served to all counsel of record via CM/ECF.

/s/ Robert Christopher Bunt
ROBERT CHRISTOPHER BUNT